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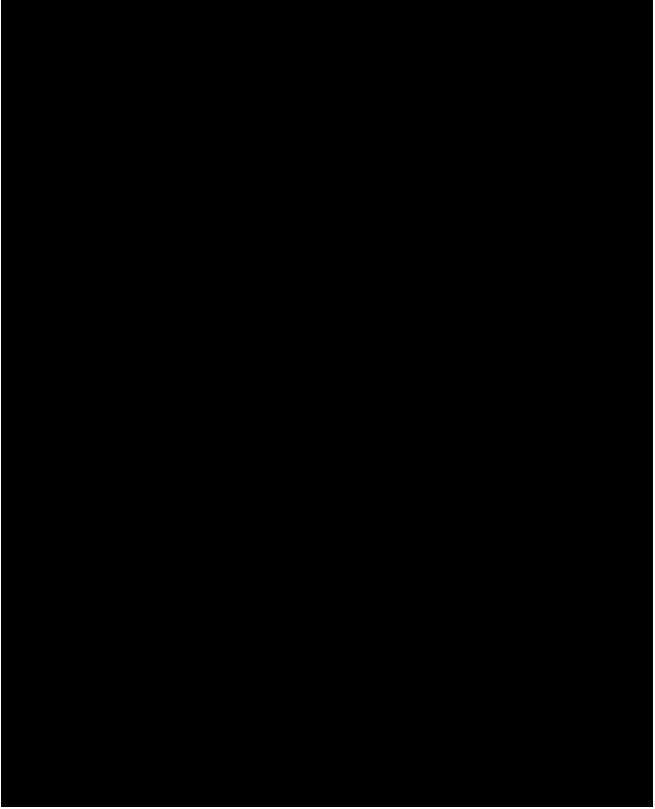14
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# EXHIBIT B

DECLARATION OF GAVIN W. SKOK
- (2:17-CV-01860-RAJ) - 5

**FOX ROTHSCHILD LLP**
1001 FOURTH AVENUE, SUITE 4500
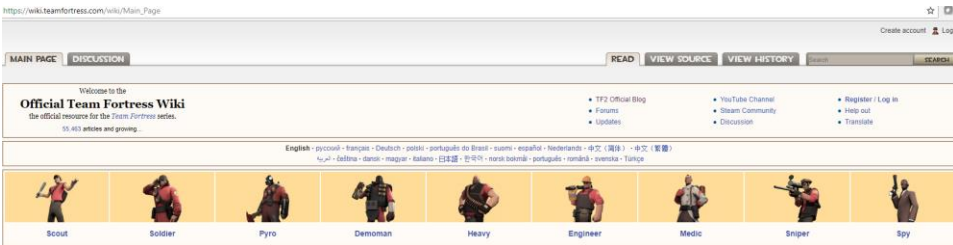SEATTLE, WA 98154
206.624.3600

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| '855 Claim 21 | TF2 (Team Fortress 2) |
|---|---|
| 21. A method of operating a plurality of character enabled (CE) network sites for a plurality of users, said method comprising the steps of: | The preamble is not limiting, and therefore need not be applied and mapped to the accused Team Fortress 2 (TF2) game.<br><br>TF2 provides a method of operating a plurality of CE network sites. As described further below, TF2 and the Steam Economy provide multiple servers and operate for a plurality of users at a time.<br><br>"The Steam Economy is our name for a set of features that allow in-game items from multiple games to work together in a single shared system in Steam. In-game items in the Steam Economy can be purchased via microtransactions, earned from Steam Achievements, delivered in-game, or granted in response to various kinds of promotions. Users can view their in-game inventories in the Steam Community, include links to items in chat sessions, and trade items with other users. Steam provides the user-interface and the heavy lifting for these features, but leaves the game itself in complete control of the items themselves." VALVE_TH_0001324-26.<br><br>"In-game items in the Steam Economy are called **Assets** and can represent anything a user can own in a game. Some examples are …**character**…" *Id*. (emphasis added).<br><br>"In order to add a game to the Steam Economy a few requirements must be met. The game must have an asset back-end that is not stored on the game client. Some kind of **database** that lives in a datacenter will be required." *Id*.<br><br>TF2 operates through the Steam platform, which integrates servers for multiple games with multiple servers that support the "Steam economy" which permits the buying and selling of in-game content developed by Valve, third parties, and users. *See* http://store.steampowered.com/about/; VALVE_TH_0000001-005, VALVE_TH_0000247-250. ██████████<br><br>████████████████████████████████████████████████<br><br>████████████████████████████████████<br><br>███████████████████████████████████████████<br><br>█████████████████████████████████████████████<br><br>████████████████████████████████ |

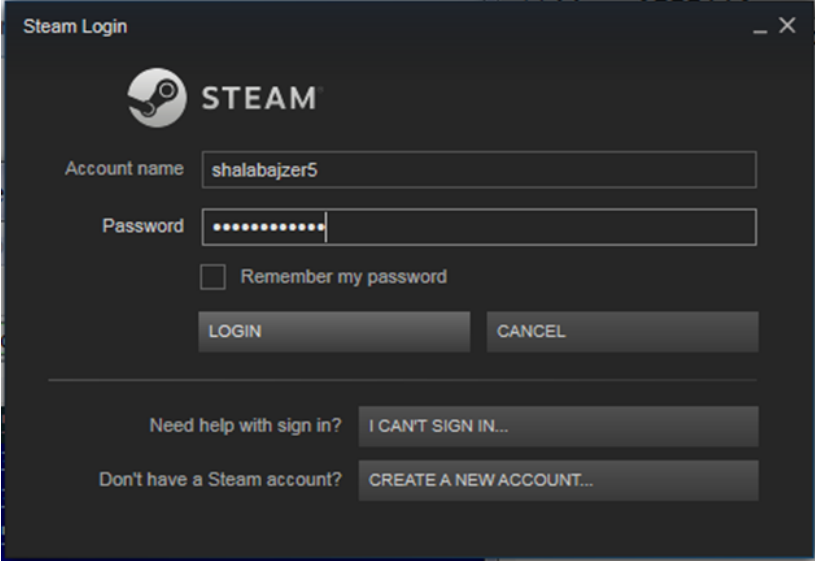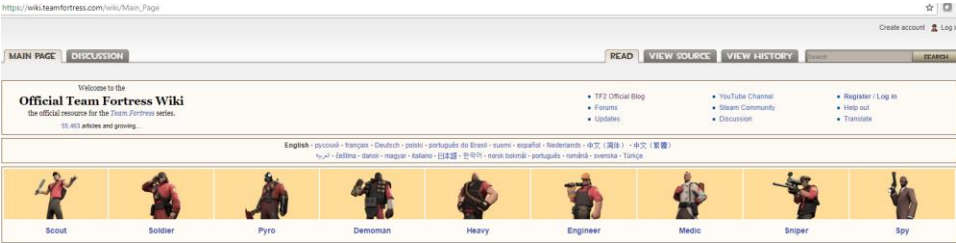| '855 Claim 21 | TF2 (Team Fortress 2) |
|---|---|
| |  "The Economy Server acts as a gateway for other Steam servers to the Asset API implementations provided by the games included in the economy. It is also responsible for tracking trades as they happen and recording the audit history for trades. The Economy Server doesn't store any of the data for a user's assets directly. That is the job of the per-game Asset Servers. The Economy Server stores meta-data about what items players own as well as the audit history for all trades." *Id*. "Secure cross-game trading is presented to the user via a web front end. This trading UI can be accessed by users either in the in-game overlay or directly via a web browser. Assets from any game participating in the economy can appear in this UI. A game's Asset Server provides the economy server with snippets of HTML to render for each tradable item and the trading UI merges those into a single page." *Id*. "The economy section of the Steam support site also uses the Economy Server to query each Asset Server about a user's assets. For most games the support site is able to see the full set assets owned by a player…A game that participates in the economy is also able to provide some or all of a user's asset inventory for display in that user's Steam Community Profile…The Game Coordinator for each Valve Game is that game's Asset Server in the Steam Economy. Valve games have a mostly-common |

| '855 Claim 21 | TF2 (Team Fortress 2) |
|---|---|
| | code base that allows them to share the back-end persistence technology across multiple games." *Id*.<br><br>TF2 operates on a Steam engine that has similar functionality to the Source 2 Engine. Source: https://wiki.teamfortress.com/wiki/Mechanics<br><br>TF2 also operates through multiple game servers. See below, showing a screen image of the developer console, including a "servers" button. Source: https://wiki.teamfortress.com/wiki/List_of_useful_console_commands<br><br><br><br>See also the image below, showing an interface for selecting one of a plurality of possible game servers:<br><br> |

| '855 Claim 21 | TF2 (Team Fortress 2) |
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| | Developer commands include the following (among others) related to the use of a plurality of game servers (*Id.*):<br><br>`cl_ask_blacklist_opt_out` <0/1> - Turns question whether to blacklist a server after leaving after a short amount of time off/on (Default: 0)<br><br>`cl_ask_favorite_opt_out` <0/1> - Turns question whether to favorite a server after leaving after a longer amount of time off/on (Default: 0)<br><br>TF2 sites are character-enabled, including the following characters.<br><br><br><br>Source: https://wiki.teamfortress.com/wiki/Main_Page |

| '855 Claim 21 | TF2 |
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| a. causing a user, through a user interface operating on a device of said user, to create a character for use on said plurality of CE network sites, said character having a character profile including a plurality of attributes selected by said user, | TF2 is played by users operating their own devices. Each of the screen displays shown above, and below, are captured from a user interface operating on a user device.<br><br>Before starting the game, Steam requires the user to log in, from his own device.<br><br><br><br>The user is caused to create a character with a character profile for use. The characters in TF2 have defined character data saved on the Game Coordinator/Steam Asset Server as described above. The TF2 game includes a plurality of heroes stored in the database.<br><br>TF2 sites are character-enabled, including the following characters.<br><br><br><br>Source: https://wiki.teamfortress.com/wiki/Main_Page<br><br>TF2 causes the user to create a character from among a plurality of possible heroes (or characters). The character further has a character profile including a plurality of attributes, including references to character attributes such as weapons, hats, clothing, and other attributes. See, for example, the character Scout and available attributes at |

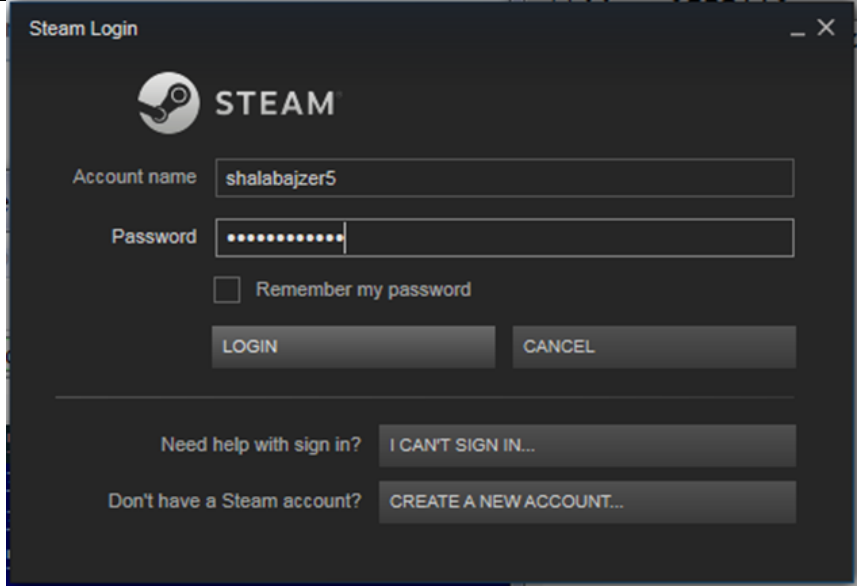| '855 Claim 21 | TF2 |
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| | https://wiki.teamfortress.com/wiki/Scout. Similar listings are provided for each of the other characters above. As an example, the Scout character is shown below together with standard or default items, for use on a plurality of CE network sites.<br><br><br><br>The Scout character is also shown below, with a different set of attributes (specifically, the Ellis Cap and the Spirit of Giving).<br><br><br><br>The other TF2 characters can be given a "loadout" and a plurality of attributes in the same manner. |

| '855 Claim 21 | TF2 |
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| b. associating said character profile with said user by receiving associating information from said user, | The character profile is associated with a user by receiving associating information from the user.<br><br>"The Steam Economy is our name for a set of features that allow in-game items from multiple games to work together in a single shared system in Steam. In-game items in the Steam Economy can be purchased via microtransactions, earned from Steam Achievements, delivered in-game, or granted in response to various kinds of promotions. Users can view their in-game inventories in the Steam Community, include links to items in chat sessions, and trade items with other users. Steam provides the user-interface and the heavy lifting for these features, but leaves the game itself in complete control of the items themselves." VALVE_TH_0001324-26.<br><br>"The Economy Server acts as a gateway for other Steam servers to the Asset API implementations provided by the games included in the economy. It is also responsible for tracking trades as they happen and recording the audit history for trades. The Economy Server doesn't store any of the data for a user's assets directly. That is the job of the per-game Asset Servers. The Economy Server stores meta-data about what items players own as well as the audit history for all trades." *Id*.<br><br>"Secure cross-game trading is presented to the user via a web front end. This trading UI can be accessed by users either in the in-game overlay or directly via a web browser. Assets from any game participating in the economy can appear in this UI. A game's Asset Server provides the economy server with snippets of HTML to render for each tradable item and the trading UI merges those into a single page." *Id*.<br><br>"The economy section of the Steam support site also uses the Economy Server to query each Asset Server about a user's assets. For most games the support site is able to see the full set assets owned by a player…A game that participates in the economy is also able to provide some or all of a user's asset inventory for display in that user's Steam Community Profile…The Game Coordinator for each Valve Game is that game's Asset Server in the Steam Economy. Valve games have a mostly-common code base that allows them to share the back-end persistence technology across multiple games." *Id*.<br><br>TF2 associates the character profile with the user by receiving associating information from the user. As noted above, the user must login, usign an account name and password as shown below. |

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| '855 Claim 21 | TF2 |
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|  | <br><br>The associating information, including the user's representative image, is shown below along with the character profile or a portion of the character profile.<br><br><br><br> |

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| '855 Claim 21 | TF2 |
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| | Clicking on the Achievements icon allows a user to see an additional screen with user-specific information. See the image below:<br><br><br><br>The above character profile is associated with the user by receiving the associating information such as the user name and password as shown above. |

| '855 Claim 21 | TF2 |
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| c. storing said associating information and said character profile in a database that is accessible to said CE network site, | The character profile is stored in a manner that is accessible to the CE network site. Character profile information is stored within the Steam Economy and replicated on the client device, as described above, particularly in the preamble.<br><br>The associating information is accessible to the CE network site, as indicated above (and reproduced below), showing the combined information presented to the user, with the character profile and user associating information presented on the same screen.<br><br><br><br>The client machine (user) communicates with the CE network site after logging in, and therefore after the CE network site has accessed the associating information, to pass character profile information to the CE network site. For example, after logging in, the client (IP address 192.168.110.58) sends data packets (numbers 1815 and 1875 below) to inform the CE network site (the Game Coordinator, IP address 162.254.193.6) about the character profile.<br><br> |

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| '855 Claim 21 | TF2 |
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|  | Communication of this sort back and forth between the user and the CE network site allows the user to login from any location and onto any of a plurality of CE network sites, then to retrieve the stored character profile associated with the particular user. |

| '855 Claim 21 | TF2 |
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| d. upon receiving a request for access to one of said plurality of CE network sites, enabling a user to retrieve a previously created character profile from said database using said associating information; | The above limitation showing the stored information also shows the user being enabled to retrieve a previously stored character profile from the database, using the associating information, upon receiving a request for access.<br><br>As described above, the user will have logged in, and after login the user's identifying image is shown iconically in the image below, at the upper left. The communication between the Steam Economy, including the CE network site, enables the user to retrieve a previously created character profile from the database, such as by the commands and exchange of equipment packets as described above. In the image below, TF2 presents to the user the previously stored character profile in this fashion.<br><br><br><br>In an example, after TF2 is accessed by a user device connecting with a CE network site (162.254.195.44 below), thereafter there is an exchange of data packets which enable the user to retrieve the previously stored character profile for use by the CE network site. An example of such an exchange is shown below.<br><br><br><br>The above request operates for any of a plurality of CE network sites, enabling a user to retrieve a previously stored character profile from the database using the associating information.  In the example above, the character profile was saved when accessing a first CE network site |

| '855 Claim 21 | TF2 |
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| | (162.254.193.6; see limitation "c" above), then accessed later via a second CE network site (162.254.195.44).<br><br>TF2 further allows for multiple game servers for placing a user into an instance of the game. There are several thousand TF2 game servers running worldwide. Source: https://wiki.teamfortress.com/wiki/Servers<br><br>Players can create their own servers to host the game, allowing alteration of maps, modes, and settings. *Id*.<br><br>Users can navigate to selected game servers on the network. In addition to the employment of different servers as noted above, the user can navigate from one server to another and choose specific servers on which to play. Using the server browser, users can select servers on which to play, such as shown in the images below. Source: https://wiki.teamfortress.com/wiki/Server_Browser#/media/File:Steam_Server_Browser.png<br><br> |

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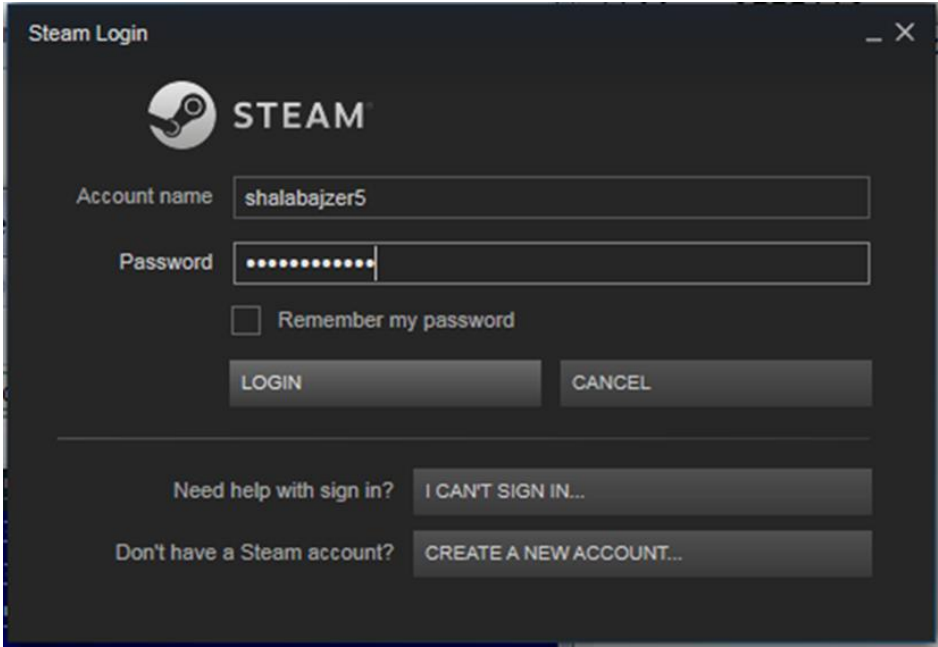| '855 Claim 21 | TF2 |
|---|---|
| | <br><br>Through the above interface, game servers can be added to favorites lists, can be saved in a history, and can be shown in a tab indicating the servers on which friends are currently playing. |

| '855 Claim 21 | TF2 |
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| e. if said user has previously created a character profile, retrieving said character profile from said database and causing said character to be displayed on said CE network site on said device of said user; and | See the discussion in the limitations above, which show a previously created character profile being retrieved from the database. In each case, the corresponding images are screen displays on a user device, while the user is within a character-enabled network site, thereby causing the character to be displayed on the CE network site on the device of the user.<br><br>See, for example, the images below.<br><br><br>First, while logged into Steam CE network site in Canada  (the Game Coordinator) with the IP address 162.254.193.6 , Scout character equipped with the Ellis Cap and The Spirit of Giving.<br><br><br>After, user has logged into CE network site (the Game Coordinator) with the IP address 162.254.195.44, and TF2 client has downloaded the previously created profile of the Scout from the Game Coordinator |

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| '855 Claim 21 | TF2 |
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| f. repeating steps a through e for a plurality of users. | TF2 uses Game Coordinator servers, as part of the Steam Economy. The GC handles login information for a large plurality of users, and keeps track of items such as characters and character attributes that have been previously selected by each user.<br><br>Each user in TF2 participates in a manner as described above. TF2 engages a plurality of users. See the image below, showing the number of current players, and number of players at various points in time. Source: http://steamcharts.com/app/440<br><br> |

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| '855 Claim 22 | TF2 |
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| 22. The method of claim 21 wherein said associating information is selected from the group consisting of: a user-assigned name for said character, a password, an IP Address, a name, an address, an email address, a zip code, information on said user's device, and combinations thereof. | As described above with respect to claim 21, a user must login with a user name, or Account name, and a password. See for example the screen image below.<br><br> |

| '855 Claim 23 | TF2 |
|---|---|
| 23. The method of claim 22 wherein said character profile is automatically retrieved by said CE network site upon entering said CE network site. | As noted in the excerpt below, the Game Coordinator handles the login and tracking of stored items (which is true for TF2 as well as for Dota2).<br><br>First, we have a server called the Game Coordinator (or GC), which is really a number of different servers that all collectively handle the backend work that Dota 2 needs (with the exception of hosting actual games). This is the server that handles your Dota 2 login, determines who you will play against in matchmaking, keeps track of where all of your items are stored, and many other functions. This also means that as we increase the number of users, this server needs to scale up. We think we're in pretty good shape for adding a pretty large number of users from the GC's perspective (we could at least double in total concurrent users), but it's one of the areas we'll be keeping an eye on as the audience grows.<br><br>TF2 further uses the Steam Economy, which stores the character profile information in a database, and as described above retrieves it in an exchange of packets between the CE network site and the user after entering the CE network site.<br><br>"The Steam Economy is our name for a set of features that allow in-game items from multiple games to work together in a single shared system in Steam. In-game items in the Steam Economy can be purchased via microtransactions, earned from Steam Achievements, delivered in-game, or granted in response to various kinds of promotions. Users can view their in-game inventories in the Steam Community, include links to items in chat sessions, and trade items with other users. Steam provides the user-interface and the heavy lifting for these features, but leaves the game itself in complete control of the items themselves." VALVE_TH_0001324-26.<br><br>"In-game items in the Steam Economy are called **Assets** and can represent anything a user can own in a game. Some examples are …**character**…" *Id*. (emphasis added).<br><br>"In order to add a game to the Steam Economy a few requirements must be met. The game must have an asset back-end that is not stored on the game client. Some kind of **database** that lives in a datacenter will be required." *Id*.<br><br>With reference to claim 21 above, the character profile is shown as being retrieved. The process described in limitations d and e occur automatically and without any input from the user after login. When a user chooses a character which was previously customized, the character is automatically shown with the customizations. |

| '855 Claim 24 | TF2 |
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| 24. The method of claim 21 wherein said user's device comprises a device selected from the group consisting of a personal computer, a mobile phone and a handheld device. | The images above, captured when interacting with TF2, are taken from personal computer screens. |